

Remarks

Claims 4 and 17-34 were pending.

Claim 32 was allowed.

Claims 4, 17-21, 24-31, 33, and 34 were rejected.

Claims 22 and 23 were objected to.

Claims 35-38 have been added.

Claims 4, 17, 18, 22, 24, 27, 28, 33, and 34 have been amended.

Claim Rejection under 35 USC § 102:

In the Office Action, the Examiner rejected claims 4, 17-21, 24-31, 33, and 34 under 35 USC §102(b) as being anticipated by Pollack et al. (United States Patent Number 5,105,888)(Pollack). To the extent the rejection applies to the amended claims, applicants respectfully traverse the rejection.

In the Office Action, the Examiner stated that Pollack teaches, “an outer tubular with slots (62), an inner tubular with slots and a tubular support member (14/16), coupling assembly (10) comprising: a tubular coupling body (12), and arms with coupling elements (36/44), and decoupling assemblies.”

Pollack states, “The tool 10 has a plurality (preferably two) of anti-rotation pins 36 (only one shown) circumferentially spaced on the tool body 12, which pins 36 are spring-biased outwardly to engage longitudinal slots 38 in the hanger 34 (FIG. 3) to prevent relative rotation between the tool body and the hanger, and each pin 36 is retained in the tool body by a washer 40 and a cap screw 42. The tool also includes an anti-rotation pin 44 that cooperates with a longitudinal groove 46 in the outer surface of the actuation sleeve 16 to prevent relative rotation between the sleeve and the tool body 12.” (Pollack, Col. 2, line 68 – Col. 3, line 11).

Applicants respectfully submit that pins 36 engage casing hanger 34, but not adapter 62, or mandrel 14, or actuation sleeve 16; and that pins 44 engage actuation sleeve 16, but not adapter 62.

Applicants respectfully submit that independent claim 4 recites the limitations of, “a coupling element extending from the coupling arm, said coupling element adapted to

mate with at least one outer tubular member slot and at least one inner tubular member slot.” Applicants respectfully submit that Pollack does not teach or suggest the desirability of the recited limitations.

Applicants respectfully submit that dependent claims 17-21 depend from allowable independent claim 4, discussed above, and are allowable for at least the same reasons.

Applicants respectfully submit that independent claim 24 recites the limitations of, “a coupling assembly for releasably coupling the outer tubular member slots to the inner tubular member slots at a plurality of discrete circumferentially spaced apart locations.” Applicants respectfully submit that Pollack does not teach or suggest the desirability of the recited limitations.

Applicants respectfully submit that dependent claims 25-26 depend from allowable independent claim 24, discussed above, and are allowable for at least the same reasons.

Applicants respectfully submit that independent claim 27 recites the limitations of, “means for releasably coupling at least one outer tubular member slot to at least one inner tubular member slot.” Applicants respectfully submit that Pollack does not teach or suggest the desirability of the recited limitations.

Applicants respectfully submit that dependent claims 28-31 depend from allowable independent claim 27, discussed above, and are allowable for at least the same reasons.

Applicants respectfully submit that independent claim 33 recites the limitations of, “a coupling assembly for releasably coupling the outer tubular member to the inner tubular member at a plurality of the discrete circumferentially spaced apart slots.” Applicants respectfully submit that Pollack does not teach or suggest the desirability of the recited limitations.

Applicants respectfully submit that independent claim 33 recites the limitations of, “means for releasably coupling the outer tubular member to the inner tubular member at a plurality of the circumferentially spaced apart slots.” Applicants

respectfully submit that Pollack does not teach or suggest the desirability of the recited limitations.

Applicants respectfully request that the Examiner withdraw the rejection to claims 4, 17-21, 24-31, 33, and 34.

Allowable Subject Matter:

In the Office Action, the Examiner stated that claims 22, 23, 32 contained allowable subject matter. The applicants appreciate the allowability of these claims.

Applicants have made no changes to allowable independent claim 32, and have rewritten allowable dependent claim 22 in independent form, and made no changes to dependent claim 23 which depends from allowable independent claim 22.

Conclusion:

In view of the foregoing amendments and remarks, it is respectfully submitted that the pending claims are drawn to novel subject matter, patentably distinguishable over the prior art of record. The Examiner is therefore respectfully requested to reconsider and allow the claims presented for reconsideration herein. To the extent that the present amendment results in additional fees, the Applicant authorizes the Commissioner to charge deposit account no. 08-1394.

Should the Examiner deem that any further amendment is desirable to place this application in condition for allowance, the Examiner is invited to telephone the undersigned at the below listed telephone number.

Respectfully submitted,

Date:

2/23/04

HAYNES AND BOONE, L.L.P.
1000 Louisiana Street, Suite 4300
Houston, Texas 77002-5012
Telephone: 713-547-2301
Facsimile: 713-547-2300
Docket No. 25791.83
H-464735_1.DOC

Todd Mattingly
Todd Mattingly
Registration No. 40,298

CERTIFICATE OF MAILING BY "EXPRESS MAIL"	
"EXPRESS MAIL" LABEL NUMBER: <u>870 5370 3615 60</u>	
DATE OF DEPOSIT: <u>2-23-04</u>	
This paper and fee are being deposited with the United States Postal Service Express Mail Post Office to Addressee service under 37 CFR §1.10 on the date indicated above and is addressed to: BOX PATENT APPLICATION, Commissioner for Patents, Alexandria, VA 22313-1450.	
Stacy Lamer	
TYPE OR PRINT NAME	
Stacy Lamer	
SIGNATURE	